

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
WEST VIRGINIA, AT MARTINSBURG**

DALE BERNARD BEARD, JR.,

Plaintiff,

v.

**CIVIL ACTION NO.: 3:23-CV-193
HONORABLE GINA GROH**

**DANIEL E. SMITH, individually, and
ADAM ALBAUGH, individually,**

Defendants.

**STIPULATION FOR EXTENSION OF DISCOVERY DEADLINE AND
DEADLINE TO DISCLOSE DEFENDANTS' EXPERT WITNESSES**

COMES NOW, Defendants Daniel E. Smith and Adam Albaugh, by counsel, Keith C. Gamble, Esq. and the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC, and advises this honorable Court that due to a medical issue, counsel has to reschedule depositions that were to take place on July 24, 2024. The depositions are currently scheduled to take place on August 29, 2024. With that said the undersigned have agreed to extend the discovery deadline to September 30, 2024, and also extend the time for these Defendants to disclose their expert witnesses until after the depositions take place on August 29, 2024. Defendant's new expert disclosure deadline will be September 20, 2024.

IT IS HEREBY STIPULATED AND AGREED that the discovery deadline will be extended to September 30, 2024, and the Defendants' expert disclosure deadline is extended to September 20, 2024.

Prepared by:

/s/ Keith C. Gamble

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